

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:)	Case No.: 19-30452-KLP
)	
Matthew Paul Kachmar et al.)	Chapter 13
)	
Debtor.)	Trustee: Suzanne Wade

MOTION TO INCUR DEBT

COMES NOW the debtors, by counsel, and in connection with their Motion to Incur Debt, respectfully state as follows:

1. The debtor filed this case under Chapter 13 of the U.S. Bankruptcy Code on January 29, 2019.
2. The debtor has applied for and WestLake Financial has approved a loan to the debtor in the amount of \$19,964.57 plus interest at 17.49% per annum to be repaid with 72 equal monthly payments of \$449.61 for the purchase of a 2015 Honda Odyssey or substantially similar vehicle at similar cost, interest and financing terms.
3. The debtors needs to purchase the referenced vehicle because their 2008 Chrysler Town and Country is in default and needs substantial repairs, listed on his schedules and confirmed plan, leaving the debtor with no other transportation.
4. The purchase of the vehicle is in the best interest of the debtor and will facilitate their ability to perform under the Chapter 13 Plan filed herein.
4. The debtor's Chapter 13 Plan has been confirmed.

WHEREFORE, the debtor requests that the court enter an order approving the aforesaid loan on the terms stated herein and for such other relief as the court may deem appropriate.

MATTHEW PAUL KACHMAR
MARY BETH KACHMAR

By: /s/ J. Bradley Winder, Jr.
Counsel

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Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on January 27, 2020 I mailed the foregoing document by electronic mail or first class mail, postage pre-paid to all parties on the mailing matrix attached herewith.

By: /s/ J. Bradley Winder, Jr.
Counsel

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NOTICE OF MOTION AND HEARING

The above-referenced debtor has filed a Motion to Incur Debt and Motion for Expedited Hearing in the above-referenced matter.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then, you or your attorney must:

- Attend a hearing to be scheduled at a later date. The Hearing will be held in Judge Phillips Court Room, Room 5100, United States Courthouse, 701 East Broad Street, Richmond VA 23219.
- If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: January 27, 2020

MATTHEW PAUL KACHMAR
MARY BETH KACHMAR

By: /s/ J. Bradley Winder, Jr.
Counsel

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Counsel

Suzanne Wade
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Arlington, TX 76096-0000

AmeriCredit/GM Financial
Po Box 181145
Arlington, TX 76096-0000

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0000

Capital One
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CarMax Auto Finance
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Re: Verizon
Harrisburg, PA 17108-0000

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